

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:13-cr-430 CDP
)
LONNY AUSTIN FIELDER,)
)
 Defendant.)

DEFENDANT’S THIRD MOTION TO CONTINUE TRIAL

COMES NOW Defendant, Lonny Fielder, by and through counsel, and hereby moves this Court to continue the trial presently scheduled for May 12, 2014 for a period of forty (40) days. In support of this motion, Defendant states as follows:

1. The parties continue their efforts to negotiate an agreed upon disposition that will obviate the need for trial.
2. To assist in this process, Defendant and counsel have sought documents from the Social Security Administration (“SSA”) to verify Defendant’s long-standing disabilities.
3. Defendant has not yet received these documents, however, and, based on the latest information received from the SSA, does not expect to receive them for about twenty (20) days.
4. For this reason, Defendant files the instant motion.
5. For this same reason, the instant motion is necessary to provide counsel for the “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” See 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, “the ends of justice

served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

6. Defendant, through counsel, has discussed this matter with assistant United States attorney John Davis. Mr. Davis does not object to Defendant’s request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the trial presently scheduled for May 12, 2014 for a period of forty (40) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
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CERTIFICATE OF SERVICE (314)862-8050

I hereby certify that on April 29, 2014, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Mr. John Davis, Assistant United States Attorney.